



VALLEY CENTER WATER DISTRICT

A Public Agency Organized July 12, 1954

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April 6, 2011

Department of Water Resources
Attn: Water Use and Efficiency Branch
901 P Street
Sacramento, CA 95814

SUBMITTED ELECTRONICALLY

Re: Draft Ag Water Measurement Regulation

Mr. Baryohay Davidoff,

Agricultural water suppliers have worked diligently over the years to ensure a sustainable water supply for our customers. We have invested in delivery systems that were engineered and painstakingly developed over many years, to provide an efficient, economical, flexible and reliable means for agricultural water delivery. Through our efforts and ultimately those of our customers, we have supplied California and moreover the world with the most abundant and diverse food, and fiber crops. We also supply water to National Wildlife Refuges, State Wildlife Areas, managed wetlands and other environmental habitat lands.

Over this past year, many hours have been spent on the creation of a regulation that will codify what SBx7-7 was written to accomplish. Members representing Agricultural water suppliers from throughout the state have provided extensive comments, offered solutions and posed questions to the Department of Water Resources (DWR) during this time. As agricultural water managers, we are uniquely positioned to provide DWR with valuable information on what modifications are needed to the regulation to make it implementable.

We are concerned that the March 18th draft regulation does not reflect many of our previously submitted recommendations. So, the undersigned agencies have put together an amended version to address water measurement accuracy standards and performance certification. Attached is the March 18 draft of the regulation with our recommended changes and an explanation of how each of the changes not only complies with Sec. 10608.48 (a) of SB X7-7, but also increases the likelihood that agricultural water suppliers will be able to meet the requirements by the July 31, 2012 deadline. Furthermore, it is important to have an implementation process that is achievable from a cost and time basis by the agricultural water agencies. Agricultural water agencies should be afforded sufficient time to adequately implement the criteria specified in the proposed regulation. As a result, on or before December 31, 2015, there shall be

substantial effort to implement the regulation. Full compliance of the proposed regulation shall be on or before December 31, 2020.

Our goal for this regulation is that it be crafted in a manner that allows the greatest number of water suppliers to implement the requirements. We are confident that our recommended changes to the regulation will do just that. We welcome the opportunity to discuss the practical application of the regulation and why our recommendations are so important to crafting a regulation that will work.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gary Arant', with a stylized flourish extending to the left.

Gary Arant
General Manager